



November 13, 2019

Bureau Chief
Air Quality Bureau
New Mexico Environment Department
525 Camino de Los Marquez, Suite 1
Santa Fe, NM 87505-1816

Certified Mail/Return Receipt
7018 1130 0000 9712 6770

**Re: Notice of Tank API 653 and Visual Inspections
EFR Tank 0057
HollyFrontier Navajo Refining LLC - Artesia, NM Refinery**

HollyFrontier Navajo Refining LLC (Navajo) writes regarding its revised Corrective Action Plan and information requested by the New Mexico Environment Department (NMED) and United States Environmental Protection Agency (EPA) pursuant to 40 C.F.R. § 63.658 for the Artesia, New Mexico refinery. In particular, EPA's letter of September 16, 2019, requested that the Company provide at least thirty (30) calendar days advance notice to EPA and NMED prior to conducting an API 653 internal inspection of Tank 57 at the refinery, and that the Company submit an API 653 report within fifteen (15) calendar days after completion of the inspection. The September 16 letter also requested that the Company provide at least thirty (30) days advance notice prior to conducting a visual inspection of the floating roof deck, deck fittings, and rim seals from both the topside and underside of the roof deck, following the requirements of 40 C.F.R. § 63.120(b)(10) and 40 C.F.R. § 63.1063(d)(1), while Tank 57 is emptied and degassed. The letter requested further that HollyFrontier provide a report of the inspection results to EPA and NMED within fifteen (15) days of the preceding visual inspection.

Navajo memorialized its commitment to provide these notifications to EPA and NMED by letter of October 11, 2019, and indicated that these inspections were anticipated to occur in the fourth quarter of 2019. The Company hereby provides notification that Navajo will perform an API 653 internal inspection of Tank 57 on December 17th beginning at approximately 8:00 am. The Company will conduct an inspection of the floating roof deck, deck fittings, and rim seals (primary and secondary seals) from both the topside and underside of the roof deck on December 17th beginning at approximately 8:00 am. Please note that the tank inspection may require fresh air packs for safe access. If you plan to observe the seal gap measurements for such tanks, accordingly please bring appropriate equipment and certified personnel.


As explained in the Company's October 11 letter, Navajo intends to keep Tank 57 Out-of-Service and "air gap" the tank from process lines going forward, which involves disconnecting all process lines to create an observable gap between the process lines and Tank 57. These measures will render Tank 57 fully nonoperational and will require a Management of Change for any potential future use of Tank 57.

Please call me at (575) 746-5487 or Ray Smalts at (575) 746-5490 if you have any questions, or as needed to coordinate with Navajo regarding the inspections discussed in this letter. The Company appreciates the opportunity to continue working cooperatively with EPA and NMED to meet the agencies' information needs related to the Artesia refinery.

HollyFrontier Navajo Refining LLC
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(575) 748-3311 • <http://www.hollyfrontier.com>

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Sincerely,



Scott M. Denton
Environmental Manager

cc: Chief
Air, Toxics, and Inspections Coordination Branch
Environmental Protection Agency, Region 6
1201 Elm Street, Suite 500
Dallas, TX 75270-2102

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